



NORLITE CORPORATION

628 SO. SARATOGA STREET
PO BOX 684
COHOES, NY 12047
PHONE: (518) 235-0401
FAX: (518) 235-0233

February 3, 2012

Mr. William J. Clarke
Regional Permit Administrator
New York State Department of Environmental Conservation
Region 4
1130 North Westcott Road
Schenectady, NY 12306-2014

RETURN RECEIPT REQUESTED VIA EMAIL

Mr. Kenneth Eng
Air Compliance Branch
United States Environmental Protection Agency
Region 2
290 Broadway
New York, NY 10007-1866

RETURN RECEIPT REQUESTED VIA EMAIL

Re: Norlite Corporation-MACT Excessive Exceedance Report
Kiln 1: 01/18/12- 02/02/12
Kiln 2: 01/18/12- 02/02/12

Dear Sirs:

In accordance with 40 CFR 63.1206(c)(3)(vi), the Norlite Corporation (Norlite) is submitting an "Excessive Exceedance Report" for the timeframe of 01/18/12 thru 02/02/12. The attached document explains each of the "malfunctions" for Kiln One and Two.

The results of the investigation concluded a majority of the exceedances were a result of the 1 second time delay cutoff limit of -0.00 inches of water column associated with the negative backend chamber pressure on Kiln 1 & 2. The general cause of these cutoffs was the use of valves to control flow rate of a difficult to handle fuel plus maintain the permitted LGF Line Pressure. At no time were fugitive emissions witnessed coming from the kiln. Norlite and its consultant will continue to evaluate each cutoff in order to reduce the overall number of cutoffs.

All of the malfunctions that occurred were consistent with our Startup, Shutdown and Malfunction Plan (SSMP). As approved by the NYSDEC on February 6, 2006, these reports are being sent electronically.

Should you have any questions regarding this letter, please contact me at (518) 235-0401 or email at: tvancouver@norlitecorp.com.

Sincerely,

Thomas Van Vranken

Thomas Van Vranken
Environmental Manager
Attachments

ecc: Don Spencer, NYDEC – R4 w/attachments
James Lansing, NYSDEC – CO w/attachments
Joe Hadersbeck, NYSDEC – R4w/attachments



NORLITE CORPORATION
MACT EXCEEDANCE REPORT - KILN 1
01/18/12 - 02/2/12

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
1/24/2012	15:04:41	1/24/2012	15:05:05	0:00:24	27	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
1/26/2012	14:10:52	1/26/2012	14:12:22	0:01:30	28	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
1/26/2012	18:54:46	1/26/2012	18:55:12	0:00:26	29	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow
1/27/2012	2:12:25	1/27/2012	2:12:48	0:00:23	30	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow
1/27/2012	5:52:26	1/27/2012	5:53:40	0:01:14	31	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow
1/27/2012	5:53:43	1/27/2012	5:54:06	0:00:23	32	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow
1/31/2012	4:14:46	1/31/2012	4:15:15	0:00:29	33	Malfunction	While Controlling LGF Line Pressure with Valves, a Fuel Flow Surge was Experienced which caused a Pressure Pulse in the Kiln System / No Fugitive Emissions were Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure to Allow Finer Adjustments at the Kilns
2/1/2012	23:56:31	2/2/2012	0:07:19	0:10:47	34	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span / I & E Cleaned Probe	Stack Gas Flow Rate	Span	I & E Cleaned Probe



NORLITE CORPORATION
MACT EXCEEDNACE REPORT - KILN 2
01/18/12 - 02/02/12

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
1/19/2012	12:37:09	1/19/2012	12:37:39	0:00:30	46	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow
1/20/2012	17:02:56	1/20/2012	17:03:34	0:00:38	47	Malfunction	While Controlling LGF Line Pressure with Valves, a Fuel Flow Surge was Experienced which caused a Pressure Pulse in the Kiln System / No Fugitive Emissions were Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure to Allow Finer Adjustments at the Kilns
1/26/2012	19:25:32	1/26/2012	19:26:01	0:00:29	48	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow
1/26/2012	21:59:06	1/26/2012	21:59:29	0:00:23	49	Malfunction	While Using Valves to Control Flow Rate of A Difficult to Handle Fuel Plus Maintain LGF Line Pressure Caused LGF Flow Interruptions and Surges Which Caused a Pressure Pulse in the Kiln System	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure As Well LGF Line Valves to Maintain Consistent Flow
1/26/2012	22:41:01	1/26/2012	22:41:35	0:00:34	50	Malfunction	While Using Valves to Control Flow Rate of A Difficult to Handle Fuel Plus Maintain LGF Line Pressure Caused LGF Flow Interruptions and Surges Which Caused a Pressure Pulse in the Kiln System	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure As Well LGF Line Valves to Maintain Consistent Flow
1/26/2012	22:44:27	1/26/2012	22:45:15	0:00:48	51	Malfunction	While Using Valves to Control Flow Rate of A Difficult to Handle Fuel Plus Maintain LGF Line Pressure Caused LGF Flow Interruptions and Surges Which Caused a Pressure Pulse in the Kiln System	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure As Well LGF Line Valves to Maintain Consistent Flow
1/26/2012	22:46:37	1/26/2012	22:46:58	0:00:21	52	Malfunction	While Using Valves to Control Flow Rate of A Difficult to Handle Fuel Plus Maintain LGF Line Pressure Caused LGF Flow Interruptions and Surges Which Caused a Pressure Pulse in the Kiln System	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure As Well LGF Line Valves to Maintain Consistent Flow
1/26/2012	22:49:06	1/26/2012	22:49:27	0:00:21	53	Malfunction	While Using Valves to Control Flow Rate of A Difficult to Handle Fuel Plus Maintain LGF Line Pressure Caused LGF Flow Interruptions and Surges Which Caused a Pressure Pulse in the Kiln System	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure As Well LGF Line Valves to Maintain Consistent Flow
1/26/2012	23:29:25	1/26/2012	23:29:58	0:00:33	54	Malfunction	While Using Valves to Control Flow Rate of A Difficult to Handle Fuel Plus Maintain LGF Line Pressure Caused LGF Flow Interruptions and Surges Which Caused a Pressure Pulse in the Kiln System	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure As Well LGF Line Valves to Maintain Consistent Flow
1/26/2012	23:42:30	1/26/2012	23:42:52	0:00:22	55	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow
1/27/2012	4:57:56	1/27/2012	4:58:32	0:00:36	56	Malfunction	While Using Valves to Control Flow Rate of A Difficult to Handle Fuel Plus Maintain LGF Line Pressure Caused LGF Flow Interruptions and Surges Which Caused a Pressure Pulse in the Kiln System	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure As Well LGF Line Valves to Maintain Consistent Flow
1/27/2012	5:10:14	1/27/2012	5:10:54	0:00:40	57	Malfunction	While Using Valves to Control Flow Rate of A Difficult to Handle Fuel Plus Maintain LGF Line Pressure Caused LGF Flow Interruptions and Surges Which Caused a Pressure Pulse in the Kiln System	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure As Well LGF Line Valves to Maintain Consistent Flow
1/27/2012	5:11:20	1/27/2012	5:11:44	0:00:24	58	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow

1/27/2012	5:14:34	1/27/2012	5:15:02	0:00:28	59	Malfunction	While Using Valves to Control Flow Rate of A Difficult to Handle Fuel Plus Maintain LGF Line Pressure Caused LGF Flow Interruptions and Surges Which Caused a Pressure Pulse in the Kiln System	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure As Well LGF Line Valves to Maintain Consistent Flow
1/27/2012	5:18:00	1/27/2012	5:18:34	0:00:34	60	Malfunction	While Using Valves to Control Flow Rate of A Difficult to Handle Fuel Plus Maintain LGF Line Pressure Caused LGF Flow Interruptions and Surges Which Caused a Pressure Pulse in the Kiln System	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure As Well LGF Line Valves to Maintain Consistent Flow
1/27/2012	5:18:39	1/27/2012	5:18:57	0:00:18	61	Malfunction	While Using Valves to Control Flow Rate of A Difficult to Handle Fuel Plus Maintain LGF Line Pressure Caused LGF Flow Interruptions and Surges Which Caused a Pressure Pulse in the Kiln System	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure As Well LGF Line Valves to Maintain Consistent Flow
1/27/2012	5:26:41	1/27/2012	5:27:07	0:00:26	62	Malfunction	While Using Valves to Control Flow Rate of A Difficult to Handle Fuel Plus Maintain LGF Line Pressure Caused LGF Flow Interruptions and Surges Which Caused a Pressure Pulse in the Kiln System	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure As Well LGF Line Valves to Maintain Consistent Flow
1/27/2012	6:01:32	1/27/2012	6:01:55	0:00:23	63	Malfunction	While Using Valves to Control Flow Rate of A Difficult to Handle Fuel Plus Maintain LGF Line Pressure Caused LGF Flow Interruptions and Surges Which Caused a Pressure Pulse in the Kiln System	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure As Well LGF Line Valves to Maintain Consistent Flow
1/27/2012	6:14:09	1/27/2012	6:14:29	0:00:20	64	Malfunction	While Using Valves to Control Flow Rate of A Difficult to Handle Fuel Plus Maintain LGF Line Pressure Caused LGF Flow Interruptions and Surges Which Caused a Pressure Pulse in the Kiln System	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure As Well LGF Line Valves to Maintain Consistent Flow
1/27/2012	12:49:29	1/27/2012	12:49:54	0:00:25	65	Malfunction	While Using Valves to Control Flow Rate of A Difficult to Handle Fuel Plus Maintain LGF Line Pressure Caused LGF Flow Interruptions and Surges Which Caused a Pressure Pulse in the Kiln System	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure As Well LGF Line Valves to Maintain Consistent Flow
1/31/2012	16:50:21	1/31/2012	16:50:54	0:00:33	66	Malfunction	While Using Valves to Control Flow Rate of A Difficult to Handle Fuel Plus Maintain LGF Line Pressure Caused LGF Flow Interruptions and Surges Which Caused a Pressure Pulse in the Kiln System	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure As Well LGF Line Valves to Maintain Consistent Flow
1/31/2012	19:12:59	1/31/2012	19:13:28	0:00:29	67	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow
2/1/2012	13:08:24	2/1/2012	13:09:02	0:00:38	68	Malfunction	While Using Valves to Control Flow Rate of A Difficult to Handle Fuel Plus Maintain LGF Line Pressure Caused LGF Flow Interruptions and Surges Which Caused a Pressure Pulse in the Kiln System	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure As Well LGF Line Valves to Maintain Consistent Flow
2/1/2012	13:48:15	2/1/2012	13:49:10	0:00:55	69	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow
2/1/2012	16:38:42	2/1/2012	16:39:07	0:00:25	70	Malfunction	While Using Valves to Control Flow Rate of A Difficult to Handle Fuel Plus Maintain LGF Line Pressure Caused LGF Flow Interruptions and Surges Which Caused a Pressure Pulse in the Kiln System	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure As Well LGF Line Valves to Maintain Consistent Flow